

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA**

**v.**

**JOEL A. TETTEH**

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)

Cr. No. 16-

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**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

[Making a Material False Statement During the Acquisition of a Firearm –  
18 U.S.C. § 922(a)(6)]

On or about April 29, 2014, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

in connection with the acquisition of (1) a Ruger model SR45 .45 caliber pistol bearing serial number 380-37031 and (2) a FNH USA, LLC. model FNX-45 Tactical .45 caliber, pistol bearing serial number FX3U019004 from Riley's Sports Shop, a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Riley's Sports Shop which statement was likely to deceive Riley's Sports Shop as to a fact material to the lawfulness of such acquisition of the firearm by the defendant, in that the defendant executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 stating that he resided at a particular address in Merrimack, New Hampshire when he did not reside at that address.

All in violation of Title 18, United States Code, Section 922(a)(6).

The Grand Jury further charges:

**COUNT TWO**

[Making a False Statement During the Purchase of a Firearm –  
18 U.S.C. § 924(a)(1)(A)]

On or about April 29, 2014, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

knowingly made a false statement and representation to Riley's Sports Shop, a federally licensed firearms dealer with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Riley's Sports Shop in that the defendant executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 stating that he resided at a particular address in Merrimack, New Hampshire when he did not reside at that address.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

The Grand Jury further charges:

**COUNT THREE**

[Smuggling Goods from the United States –  
18 U.S.C. § 554(a)]

On or about April 29, 2014, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

did fraudulently and knowingly receive, conceal, buy, sell, and facilitate the transportation, concealment, and sale of merchandise, including (1) a Ruger model SR45 .45 caliber pistol bearing serial number 380-37031 and (2) a FNH USA, LLC. model FNX-45 Tactical .45 caliber, pistol bearing serial number FX3U019004, which are defense articles as defined under Category I of the United States Munitions List, prior to exportation, knowing said merchandise to be intended for exportation, contrary to any law or regulation of the United States, in that the defendant had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) and (c) and Title 22, Code of Federal Regulations, Parts 121, 123, and 127.

All in violation of Title 18, United States Code, Section 554(a).

The Grand Jury further charges:

**COUNT FOUR**

[Making a Material False Statement During the Acquisition of a Firearm –  
18 U.S.C. § 922(a)(6)]

On or about October 29, 2014, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

in connection with the acquisition of a Sig Sauer model P229 .40 caliber pistol bearing serial number 55B002976 from Riley's Sports Shop, a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Riley's Sports Shop which statement was likely to deceive Riley's Sports Shop as to a fact material to the lawfulness of such acquisition of the firearm by the defendant, in that the defendant executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 stating that he resided at a particular address in Merrimack, New Hampshire when he did not reside at that address.

All in violation of Title 18, United States Code, Section 922(a)(6).

The Grand Jury further charges:

**COUNT FIVE**

[Making a False Statement During the Purchase of a Firearm –  
18 U.S.C. § 924(a)(1)(A)]

On or about October 29, 2014, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

knowingly made a false statement and representation to Riley's Sports Shop, a federally licensed firearms dealer with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Riley's Sports Shop in that the defendant executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 stating that he resided at a particular address in Merrimack, New Hampshire when he did not reside at that address.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

The Grand Jury further charges:

**COUNT SIX**

[Smuggling Goods from the United States –  
18 U.S.C. § 554(a)]

On or about October 29, 2014, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

did fraudulently and knowingly receive, conceal, buy, sell, and facilitate the transportation, concealment, and sale of merchandise, including a Sig Sauer model P229 .40 caliber pistol bearing serial number 55B002976, which is a defense article as defined under Category I of the United States Munitions List, prior to exportation, knowing said merchandise to be intended for exportation, contrary to any law or regulation of the United States, in that the defendant had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) and (c) and Title 22, Code of Federal Regulations, Parts 121, 123, and 127.

All in violation of Title 18, United States Code, Section 554(a).

The Grand Jury further charges:

**COUNT SEVEN**

[Making a Material False Statement During the Acquisition of a Firearm –  
18 U.S.C. § 922(a)(6)]

On or about May 6, 2015, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

in connection with the acquisition of (1) a Ruger model SR45 .45 caliber, pistol bearing serial number 380-41788; (2) a Ruger model SR40 .40 caliber, pistol bearing serial number 342-88830; and (3) a Stoeger model Cougar 8000 9mm pistol bearing serial number T6429-14B00612 from Riley's Sports Shop, a federally licensed firearms dealer within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Riley's Sports Shop which statement was likely to deceive Riley's Sports Shop as to a fact material to the lawfulness of such acquisition of the firearm by the defendant, in that the defendant executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 stating that he resided at a particular address in Merrimack, New Hampshire when he did not reside at that address.

All in violation of Title 18, United States Code, Section 922(a)(6).

The Grand Jury further charges:

**COUNT EIGHT**

[Making a False Statement During the Purchase of a Firearm –  
18 U.S.C. § 924(a)(1)(A)]

On or about May 6, 2015, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

knowingly made a false statement and representation to Riley's Sports Shop, a federally licensed firearms dealer with respect to information required by the provisions of Chapter 44, Title 18, United States Code, to be kept in the records of Riley's Sports Shop in that the defendant executed a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 stating that he resided at a particular address in Merrimack, New Hampshire when he did not reside at that address.

All in violation of Title 18, United States Code, Section 924(a)(1)(A).



The Grand Jury further charges:

**COUNT NINE**

[Smuggling Goods from the United States –  
18 U.S.C. § 554(a)]

On or about May 6, 2015, in the District of New Hampshire, the defendant,

**JOEL A. TETTEH,**

did fraudulently and knowingly receive, conceal, buy, sell, and facilitate the transportation, concealment, and sale of merchandise, including (1) a Ruger model SR45 .45 caliber, pistol bearing serial number 380-41788; (2) a Ruger model SR40 .40 caliber, pistol bearing serial number 342-88830; and (3) a Stoeger model Cougar 8000 9mm pistol bearing serial number T6429-14B00612, which are defense articles as defined under Category I of the United States Munitions List, prior to exportation, knowing said merchandise to be intended for exportation, contrary to any law or regulation of the United States, in that the defendant had not obtained a license or written authorization for such export, in violation of Title 22, United States Code, Sections 2778(b)(2) and (c) and Title 22, Code of Federal Regulations, Parts 121, 123, and 127.

All in violation of Title 18, United States Code, Section 554(a).

A TRUE BILL

/s/ Foreperson  
Grand Jury Foreperson

EMILY GRAY RICE  
United States Attorney

/s/ John J. Farley  
John J. Farley  
Assistant U.S. Attorney

Dated: February \_\_\_, 2016